

ROY F. VIOLA JR.  
RVIOLA@GRSM.COM  
DIRECT DIAL: (973) 549-2552

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER®**

ATTORNEYS AT LAW  
18 COLUMBIA TURNPIKE, SUITE 220  
FLORHAM PARK, NJ 07932  
WWW.GRSM.COM

June 3, 2024

**VIA CM/ECF**

THE HON. JOHN MILTON YOUNGE, U.S.D.J.  
15613 U.S. COURTHOUSE  
601 MARKET STREET  
PHILADELPHIA, PA 19106

**Re: McGillvary v Scutari, et al.**  
**Civil Docket No.: 1:23-cv-22605-JMY**

Dear Judge Younge:

I represent (list all the individuals who were served and part of my initial request for extension); they are the various board members or employees of the Fort Monmouth Economic Revitalization Agency ("FMERA"). I have reviewed the plaintiff's motion for relief, which is ostensibly a motion for injunctive relief (ECF No. 81). We received the notification from the Court that the motion is scheduled on July 1, making FMERA's opposition due on June 17. I confess that I and my colleagues at the New Jersey Attorney General's Office have struggled to parse out plaintiff's arguments, compounded by the fact plaintiff has not offered the Court a single document/exhibit to support his claims. Additionally, there is a layer of review that will be necessary in the Attorney General's office once my opposition is completed. There are literally hundreds of pages of documents maintained by FMERA relating to this issue and it will take some time to evaluate which ones may apply to plaintiff's claims.

In order to properly respond to the motion, I therefore request that the motion be rescheduled to August 5, 2024. Defendants' opposition would therefore be due on July 22.

I thank the Court for its consideration.

Respectfully submitted,  
**GORDON REES SCULLY MANSUKHANI,**  
**LLP**

/s/ *ROY F. VIOLA*  
Roy F. Viola Jr.

cc: Caleb L. McGillvary  
1222665/SBI102317G  
New Jersey State Prison  
P.O. Box 861  
Trenton, NJ 08625